UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

October 30, 2007

Reply To: ECL-115

Matt McClincy
DEQ Northwest Region
Portland Harbor Section
2020 SW Fourth Ave., Suite 400
Portland, OR 97201

RE: EPA comments on Riverbank Stabilization at EOSM: An Interim Remedial Measure for Source Control (July 2007)

Dear Mr. McClincy:

Thank you for allowing EPA to comment on the above referenced document (the document); we have reviewed the document for environmental protection improvement expected from the proposed work and consistency with other work being performed within the Portland Harbor Superfund site. EPA provides the following comments to be considered in future design documents for this cleanup action.

EPA is concerned about the permanence of the measure design in relation to: (1) contamination remaining on site under the "cover"; (2) permeability of the "cover"; and (3) placement of "cover" material. It appears that the vast amount of material and area of the "cover" may preclude removing it in the future should it be determined that this remedy interferes with potential future remedy designs for the protection of human health and the environment.

1. The data shows that the contamination is quite heterogeneous (i.e., there is no specific source area), which would corroborate with the regrading and movement of contaminated material over time at this site. Thus, unsampled areas may contain high concentrations of contaminants that will not be removed. If the "cover" or a portion of the "cover" needs to be removed in the future, it may be contaminated with residual contamination in the river bank. EPA recommends, at a minimum, placement of a material (e.g., geotextile fabric as a marker) that would discern the cover material from the underlying river bank material.
2. The "cover" is permeable by design which may allow for contamination remaining in the river bank soil to leach into the river sediment, which may pose

risk or recontamination to the in-water remedy. The design should provide an analysis of the potential for residual contamination in the river bank to leach into the river sediments.

3. While the design did consider possible in-water remedies (e.g., dredging, capping), the placement of the "cover" may prevent other upland source control remedies (e.g., groundwater containment) from being implemented in the future that may be necessary to reduce in-water risk and prevent recontamination of the remedy. This design should illustrate how it would not interfere with other possible upland remedies (e.g., installation of sheetpile wall, slurry wall, reactive barrier, etc.).

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine Koch
Remedial Project Manager